



Aronberg Goldgehn Davis & Garmisa  
330 North Wabash Ave., Suite 1700  
Chicago, Illinois 60611-3586  
TEL: 312-828-9600  
FAX: 312-828-9635  
www.agdglaw.com

**Amber O. LaFevers**  
DIRECT: 312-755-3170  
DIRECT FAX: 312-222-6358  
alafevers@agdglaw.com

**Daniel J Berkowitz**  
DIRECT: 312-755-3167  
DIRECT FAX: 312-222-6376  
dberkowitz@agdglaw.com

OUR FILE NUMBER: 101475.001900

December 11, 2018

**VIA E-MAIL**

Regional Freedom of Information Officer  
Attn: Nancy Oh  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

**Re: FOIA Request – Doe Run Resources Corporation/St. Joe Minerals  
Tri-State Sites – Oklahoma (Tar Creek)**

Dear Ms. Oh:

Pursuant to the Freedom of Information Act (5 U.S.C. § 552, *et. seq.*) (the “Act”), and the procedures specified in the Environmental Protection Agency’s (“EPA”) regulations (40 CFR § 2), Allstate Insurance Company (“Northbrook”)<sup>1</sup> requests that the EPA make the following records available to Northbrook to the extent that they are in the EPA’s possession or reasonably obtainable by the EPA:

1. Any and all documents referring or relating to the sites listed below (collectively, the “Sites”), including, but not limited to, documents regarding any environmental claims, remediation, property damage, pollution, or contamination at the Sites. The Sites include the following:
  - a. the Tri-State Sites located in the Tri-State Mining District region located at or near the border of Missouri, Kansas and Oklahoma<sup>2</sup> (“Tri-State Sites”).

---

<sup>1</sup> Allstate Insurance Company, solely as successor-in-interest to Northbrook Excess and Surplus Insurance Company, formerly known as Northbrook Insurance Company.

<sup>2</sup> It is our understanding that some of the Tri-State Sites are in Missouri and Kansas, which are in Region 7 for purposes of FOIA requests to the EPA. We have made a separate request to the Region 7 FOIA Officer for the Tri-State Sites.

2. All documents between the EPA and the Doe Run Resources Corporation (and/or its predecessor St. Joe Minerals Corporation) (collectively "Doe Run") referring or relating to any of the Sites.
3. All documents referring or relating to Doe Run's historical mining operations at the Sites.

In this request, the term "documents" refers to all correspondence, notes, memoranda, telephone records, photographs, permits, maps, studies, data compilations, field notes, analyses, test results, transcripts, records, electronic transmissions, electronic documents, including email, or any other material responsive to this request that has been memorialized in writing or other means of data recordation, including all cover letters or transmittal notes attached to such documents (including all internal correspondence, notes, memoranda, electronic transmissions or other records and those transmitted by EPA contractors and/or subcontractors). This request for records specifically includes all records currently in the possession of EPA's contractors, subcontractors, experts, or technical assistants which EPA could obtain through a similar request to such contractors, subcontractors, experts, and technical assistants.

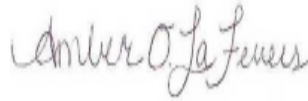
We request that the EPA respond to our request within the twenty-day period prescribed in the Act and provide the above-requested records as soon as possible. If it will not be possible to provide documentation in response to the request also within that period, please contact me so we can work out a reasonable date.

Also, to the extent that this request requires copying costs, Northbrook agrees in advance to pay such costs, up to \$200. If the copying costs will exceed \$200, please contact me prior to incurring such costs. And should payment for copying of these documents be required in advance, please contact us with a schedule of fees for copying, the amount required, and instructions for forwarding our payment. Northbrook is also amenable to making arrangements for an outside vendor to copy the records that you identify as responsive to this request. We are also open to and would prefer receiving the records in electronic format, provided that you identify the format for the records, and that it is a format generally available for review of electronic records (*e.g.*, .doc, .txt, .xls, .pdf, .tif, etc.). Northbrook also would be happy to provide a Sharefile link for you to load the records to if you feel that would be the most efficient method. We would like to obtain these records in the least burdensome way for you that will enable us to obtain as quickly and efficiently as possible.

In the event that the EPA is claiming that some of the requested documents are not subject to disclosure under §552(b), any other provision of the Freedom of Information Act, or any other legal authority, please produce any reasonable segregable portion of such documents and further provide us with a detailed index describing each requested document or record that the EPA is not releasing pursuant to this request and the basis for your refusal to supply any such document.

Your prompt attention to this request is appreciated. In the event that you need further information or wish to discuss this matter further, please do not hesitate to contact us. Thank you in advance for your assistance.

Very truly yours,

A handwritten signature in cursive script, reading "Amber O. LaFevers".

Amber O. LaFevers

AOL/DJB

cc: Catherine Connelly-Warren (via e-mail)  
Daniel J. Berkowitz (via e-mail)

#2243945